

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO,  
et al.,  
Debtor.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)  
Chapter 13

**REPLY TO THE ONE HUNDRED NINETY-NINTH OMNIBUS OBJECTION  
(SUSTATIVE) OF THE COMMONWEALTH OF PUERTO RICO TO  
CLAIMS ASSERTED BY HOLDERS OF CERTAIN PRASA SENIOR LIEN BONDS**

TO THE HONORABLE COURT:

**COMES NOW** creditor **COOPERATIVA DE AHORRO Y CREDITO ORIENTAL**

through its legal representation who respectfully prays:

1. On June 11<sup>th</sup>, 2020, the Debtor, The Commonwealth of Puerto Rico by and through the Financial Oversight and Management Board for Puerto Rico, as the representative of the Commonwealth filed the One Hundred Ninety-Ninth Omnibus Objection to claims #30417, #30355, #30459, and #30509 filed by Cooperativa de A/C Oriental . (Docket Entry #13407)
2. The objection to the claim was based under the ground that the Commonwealth is not liable of claim for bonds issued by PRASA.

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<sup>1</sup>The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3841); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case Numbers due to software limitations).

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3. Creditor herein opposes to the Objection filed and seeks recovery for amounts from which The Commonwealth of Puerto Rico is liable as guarantor of the liability owed by PRASA.

4. The Claim must be allowed under 11 U.S.C. § 502(b)(1) because it is enforceable against Debtor under the Full Faith and Credit clause of the Constitution of The Commonwealth of Puerto Rico and/or The Constitution of the United States of America.

**WHEREFORE** it's respectfully requested from this Honorable Court that the Proof of Claims #30417, #30355, #30459 and #30509 be allowed, and denies Debtor's Objection to such claims.

**CERTIFICATE OF SERVICE:** I HEREBY CERTIFY that on this same date, I electronically filed the present motion with the Clerk of the Court using CM/ECF System which will send notification to: Mr. Hermann D. Bauer, Esq., and to Mr. Martin J. Bienenstock, Esq., to their respective electronic mail; and I **Hereby Certify** that a copy of this document is sent by regular mail to: Mr. Mr. Hermann D. Bauer, Esq., O'Neill & Borges, LLC, 250 Munoz Rivera Ave., Suite 800, San Juan, Puerto Rico 00918-1813, and to Mr. Martin J. Bienenstock , Proskauer Rose, LLC, Evelen Times Square, New York, NY 1036.

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**RESPECTFULLY SUBMITTED** in Humacao, Puerto Rico, on the 13<sup>th</sup> day of July 2020.

SANTOS BERRIOS LAW OFFICES LLC  
PO BOX 9102  
HUMACAO PR 00792-9102  
TEL (787)285-1001, FAX (787)285-8358  
E-mail: santosberriosbk@gmail.com

/s/JUAN A SANTOS-BERRIOS ESQ  
USDC-PR #212506